

TABAK, MELLUSI & SHISHA LLP

**29 BROADWAY
SUITE 2400
NEW YORK, NEW YORK 10006**

TEL (212) 962-1590
TEL (800) 280-1590
FAX (212) 385-0920
www.sealawyers.com

RALPH J. MELLUSI
JACOB SHISHA*


*ALSO ADMITTED IN
NEW JERSEY AND
LOUISIANA

OF COUNSEL
STEPHEN B. ROBERTS

July 21, 2021

Via ECF

The Honorable Vernon S. Broderick
United States District Judge
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 7/22/2021

Re: Erin F. Murray as Executrix and Personal Representative
of the Estate of Timothy M. Murray v. AET Inc. Ltd.
Vessel: M/V EAGLE TURIN
USDC, SDNY – Case No. 21-Civ. 03360 (VSB)
Our File#: S2643.20

Dear Judge Broderick,

We represent plaintiff, and with the consent of the defendants are writing for an extension of time to file our Opposition Brief to their Fed. R. Civ. P. 12(b)(6) Motion to Dismiss. The opposition is currently due on July 30, 2021, we are requesting an extension to September 14, 2021. This is the first request for an extension.

Plaintiff and defendants are negotiating a stipulation that can eliminate several issues raised in their motion and will simplify matters for the parties and the Court. The parties need additional time to discuss the stipulations with their clients and work out the details. Additional time is also needed due to complexity of the issues, summer vacation schedules and parties working remotely.

Counsel for defendant has requests the time for their filing a reply brief be extended to 21 days after the filing of plaintiff's opposition brief, to which plaintiff consents.

We thank the Court for its consideration, and remain

Respectfully yours,
Tabak, Mellusi & Shisha LLP

Jacob Shisha



JS/kf